

## EXHIBIT B

1 UNITED STATES DISTRICT COURT  
2 DISTRICT OF MASSACHUSETTS  
3  
4

5 In re: NEURONTIN MARKETING, )  
6 SALES PRACTICES AND PRODUCTS )  
7 LIABILITY LITIGATION )  
8 ----- ) MDL Docket No. 1629  
9 THIS DOCUMENT RELATES TO: ) Master File No.  
10 ) 04-10981  
11 BULGER v. PFIZER, et al., )  
12 07-11426-PBS ) Judge Patti B. Saris  
13 ) Magistrate Leo T.  
14 SMITH v. PFIZER, et al, ) Sorokin  
15 05-CV-11515-PBS )  
16 -----

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18 DEPOSITION OF ALEXANDER RUGGIERI, taken  
19 at 999 Enchanted Way, Board Room 3,  
20 Simi Valley, California, commencing at  
21 9:10 A.M., Friday, December 5, 2008,  
22 before Kathleen E. Barney, CSR #5698.  
23

24 Job No. 183324

25 PAGES 1 - 330

1 BY MR. ALTMAN:

2 Q. Was there some kind of a statement by the  
3 FDA in January of this year concerning antiepileptics  
4 and suicidality?

5 A. I was -- I came to be aware of that, yes.

6 Q. So there was a statement -- there was a  
7 communication --

8 A. I'd have to check the exact -- sorry. I'd  
9 have to check the exact date to say I was aware on a  
10 certain date. I became aware of it. I'm not sure if  
11 it was on the exact date of the alert.

12 Q. Okay. And that document discussed  
13 antiepileptic drugs, correct?

14 A. The alert that I eventually found my way to  
15 was the web link to that, and if that's what you mean  
16 by a document, yes.

17 Q. Okay. And Neurontin is one of those drugs,  
18 correct?

19 A. Neurontin -- I'm not sure -- I can't recall.  
20 I'd have to look at the specific alert. I'm not sure  
21 if the -- if Neurontin was enumerated. I'd have to  
22 check. I believe my memory says it was included.

23 Q. At the time that alert came out, do you  
24 believe you possessed the requisite qualifications to  
25 discuss that alert and how to interpret that alert?

1 MR. BARNES: Objection. He had the  
2 requisite qualifications as a physician and drug  
3 safety expert to interpret the safety alert?

4 BY MR. ALTMAN:

5 Q. Do you have the -- do you possess -- did you  
6 possess the requisite qualifications to interpret and  
7 comment upon the alert?

8 A. Yes.

9 Q. Okay. So that's not some new skill you just  
10 obtained between then -- you could have done it back  
11 in January, correct?

12 A. I don't understand the question.

13 Q. Bad question. Forget it. Strike that.

14 MR. BARNES: In January -- I think he  
15 answered in January he was qualified to interpret the  
16 safety alert. He answered that already. That was  
17 your question.

18 MR. ALTMAN: That's fine.

19 MR. BARNES: Yeah. He's answered that.

20 MR. ALTMAN: Okay.

21 BY MR. ALTMAN:

22 Q. Do you believe you possess the  
23 qualifications to express opinions based upon the  
24 statistical analysis done by the FDA in response to  
25 that alert?

1 A. Yes.

2 Q. Okay. What is the basis of that -- those  
3 qualifications?

4 A. I have a master's in public health with --  
5 which includes epidemiological training. I've worked  
6 in pharmacovigilance, pharmacoepidemiology. Versed  
7 in the techniques that can be applied to study both  
8 signal detection and analysis of data for drawing  
9 safety inferences. I'm a physician and I understand  
10 the impact and the meaning of these types of alerts  
11 and both the potential positive and negative impacts  
12 they can have on patient care. And in this  
13 particular case I immersed myself in a lot of the  
14 information specific to Neurontin that was included  
15 in that alert.

16 Q. Okay. Do you believe that you possess the  
17 requisite qualifications to review the advisory  
18 committee transcripts -- strike that.

19 Are you aware that an advisory committee  
20 meeting took place in July of 2008 with respect to  
21 antiepileptic drugs and suicidality?

22 A. Yes.

23 Q. Were you aware that Neurontin was one of the  
24 drugs discussed in that meeting?

25 A. I believe it was the FDA meta-analysis that

1 was discussed in that meeting. I did not recall  
2 specific discussions about Neurontin in that meeting.

3 Q. But Neurontin was one of the drugs that was  
4 the subject of the meeting, correct?

5 A. No. The FDA meta-analysis and this abstract  
6 aggregation that this meta-analysis constructed was  
7 the object of that meeting.

8 Q. Was there data from Neurontin included as  
9 part of that meta-analysis?

10 A. There was data about Neurontin that was  
11 included in that meta-analysis.

12 Q. Were you -- do you possess the  
13 qualifications to discuss -- to render opinions based  
14 upon what was discussed in that advisory committee  
15 meeting?

16 A. Yes.

17 Q. And is the basis for that the same basis as  
18 we talked about before in understanding FDA alerts?

19 A. Everything I enumerated in my last  
20 statement.

21 Q. Okay. Are you an epidemiologist?

22 A. Yes.

23 Q. Do you have a degree in epidemiology?

24 A. I have a master's degree in public health  
25 which requires epidemiology training.